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**Elridge A. Stafford**

Executive Director-Federal Regulatory

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AUG 24 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

August 24, 2000

**EX PARTE**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, SW, TW-A325  
Washington, DC 20554

RE: CC Docket No. 99-200/Number Resource Optimization

Dear Ms. Salas:

On August 24, 2000, Bill Johnston, Joe Lord, and the undersigned, representing Qwest,<sup>1</sup> met with Diane Harmon, Aaron Goldberger, Cheryl Callahan and Sanford Williams of the Common Carrier Bureau Network Services Division, and Ana Jackson-Curtis of the Common Carrier Bureau Competitive Pricing Division. Jeff Mitchell, also representing Qwest, participated in the meeting via telephone. The purpose of this meeting was to discuss Qwest's costs to implement thousands-block number pooling and new number administration procedures and processes mandated pursuant to the Federal Communication Commission's ("FCC") Report and Order<sup>2</sup> in the above-referenced docket. The attached material was distributed at the meeting. This material and the cost details submitted in the Comments<sup>3</sup> of Qwest in the FCC's Further Notice of Proposed Rule Making<sup>4</sup> in this docket served as the basis of the discussion.

<sup>1</sup> On June 30, 2000, U S WEST, Inc., the parent and sole shareholder of U S WEST Communications, Inc., merged with and into Qwest Communications International Inc. Further, on July 6, 2000, U S WEST Communications, Inc. changed its name to Qwest Corporation.

<sup>2</sup> In the Matter of Number Resource Optimization, CC Docket No. 99-200, Report and Order and Further Notice of Proposed Rulemaking, FCC 00-104, rel Mar. 31, 2000.

<sup>3</sup> Comments filed on May 19, 2000, Erratum to Comments filed May 22, 2000.

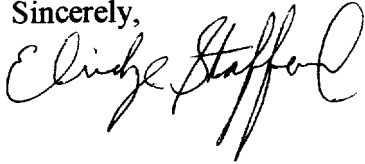
<sup>4</sup> Id.

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In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and one copy of this letter and attachments are being filed with your office for inclusion in the public record of this proceeding.

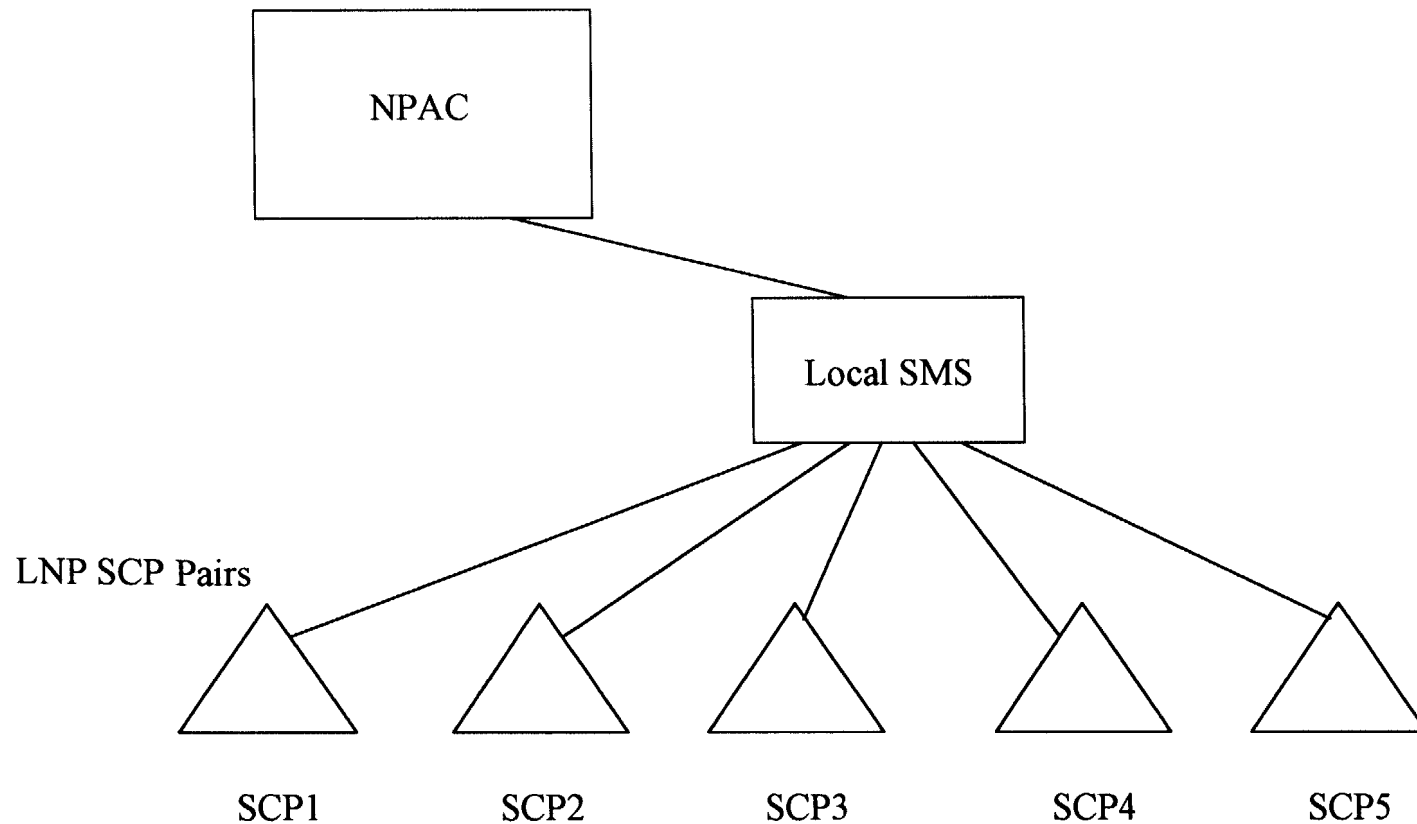
Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is included for this purpose.

Sincerely,

A handwritten signature in black ink, appearing to read "Elridge Stafford". The signature is fluid and cursive, with a large, stylized initial "E".

Attachments

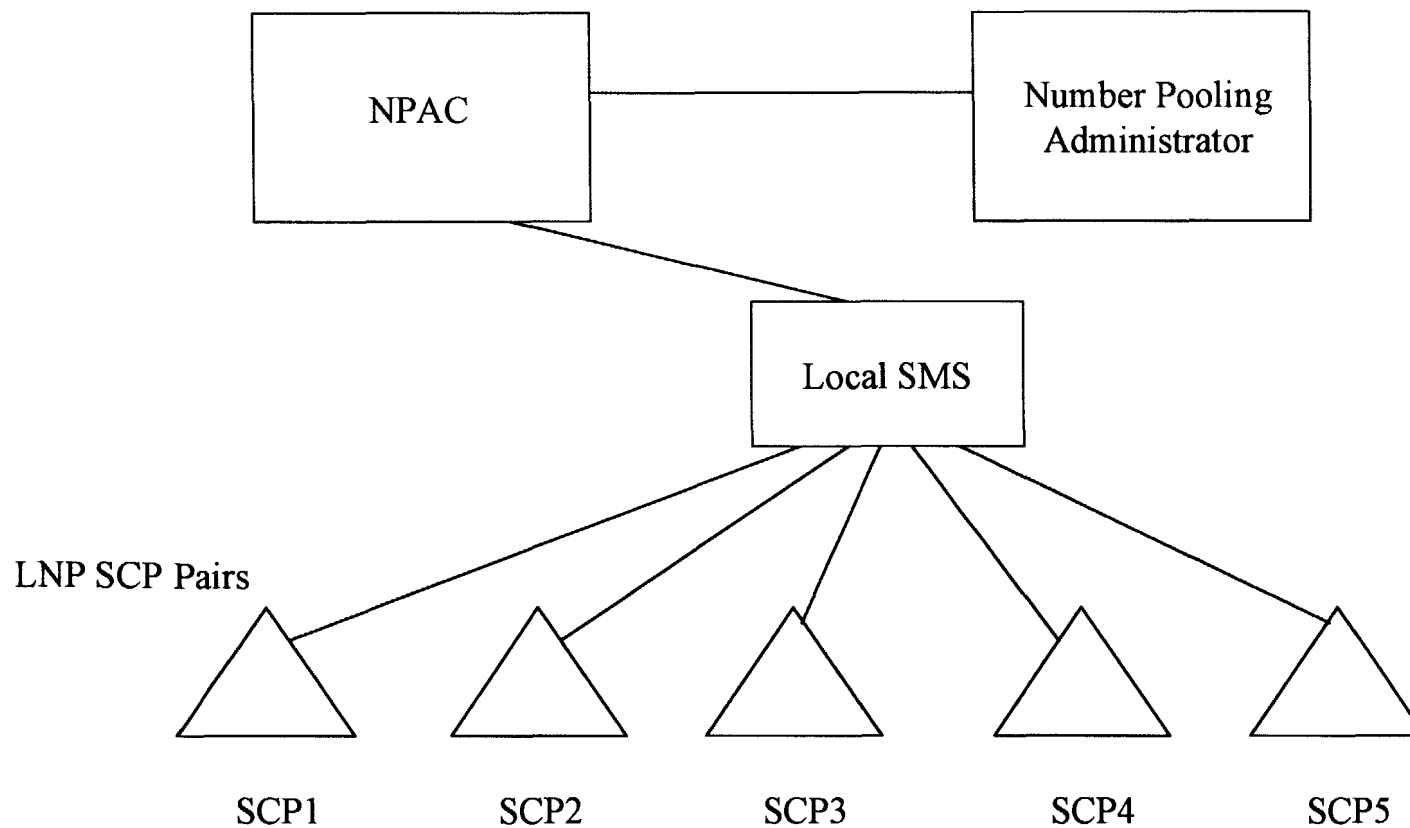
cc: Diane Harmon  
Aaron Goldberger  
Cheryl Callahan  
Sanford Williams  
Ana Jackson-Curtis



With LNP the NPAC sends to the Local SMS each ported number with its LRN number.

With number pooling and NPAC 1.4 the NPAC sends to the Local SMS each pooled number with its LRN number.

In both instances the Local SMS repeats the information to the impacted SCPs.



With number pooling and NPAC 3.0 the NPAC sends to the Local SMS each ported number with its LRN number, it also sends a range of pooled numbers with a single LRN to the Local SMS.

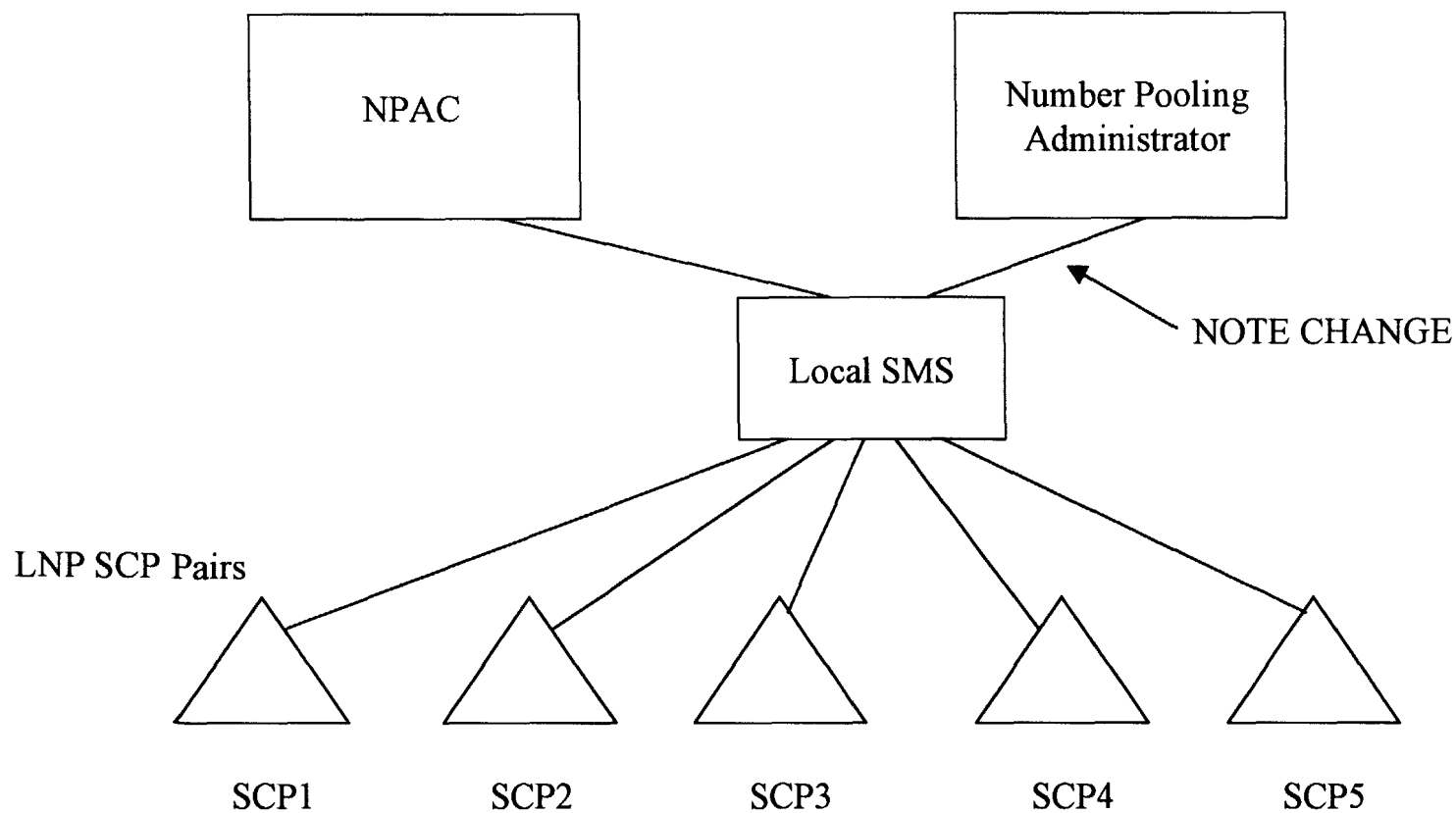
The Local SMS sends the same information to the impacted SCPs.

The Number Pooling Administrator provides data through the NPAC using EDR.

The implementation of EDR by the NPAC requires that the Local SMS be modified for EDR.

Modification of the Local SMS for EDR requires that all of the LNP SCPs be modified for EDR.

The LNP query and response remains the same between the switch and the SCP, there is no change required for EDR in the switch.

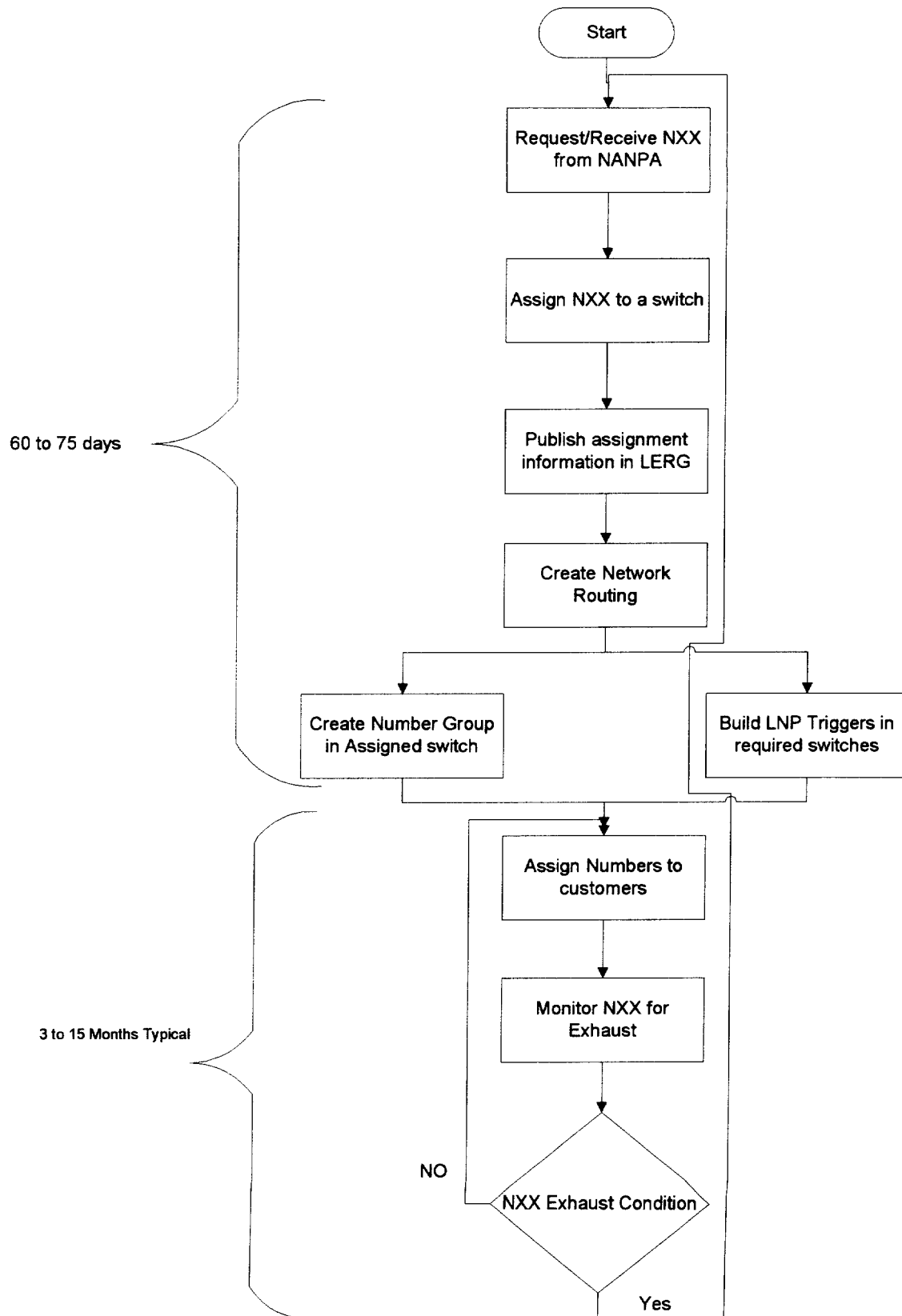


With number pooling and NPAC 3.0 the NPAC sends to the Local SMS each ported number with its LRN number. And sends a range of pooled numbers with a single LRN to the Local SMS.

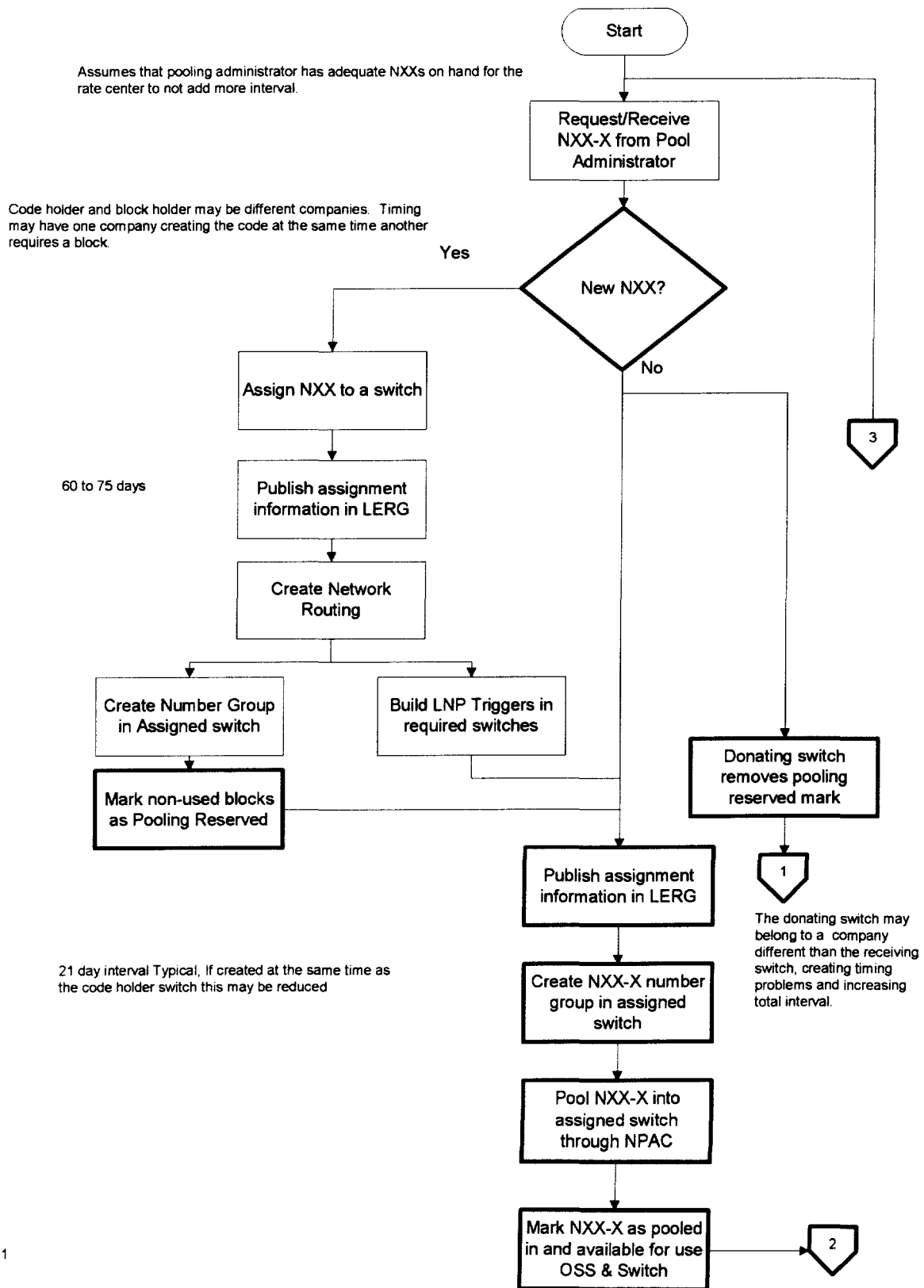
The Local SMS sends the same information to the impacted SCPs.

This alternate interconnection of the Number Pooling Administrator provides data directly to the Local SMS using EDR. It is anticipated that this implementation will delay the usage of EDR.

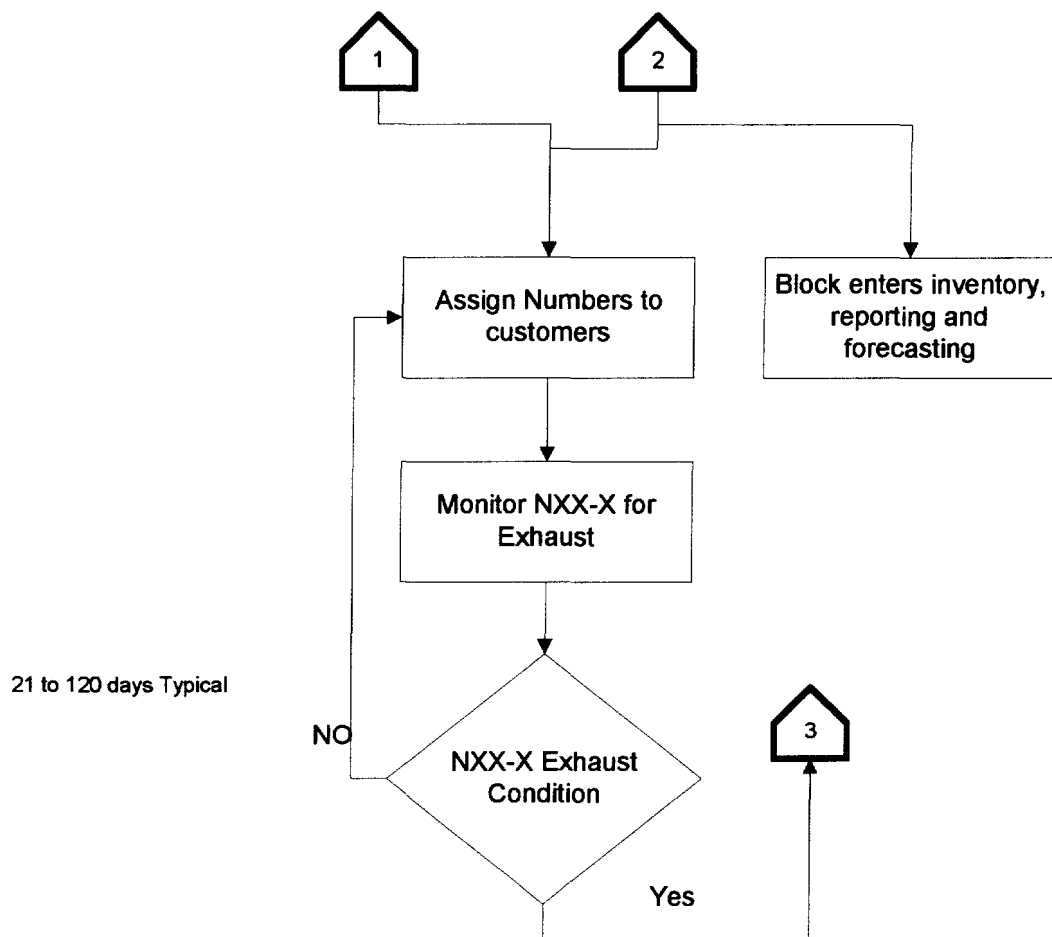
# Current Number Assignment



# Proposed Number Assignment With Number Pooling





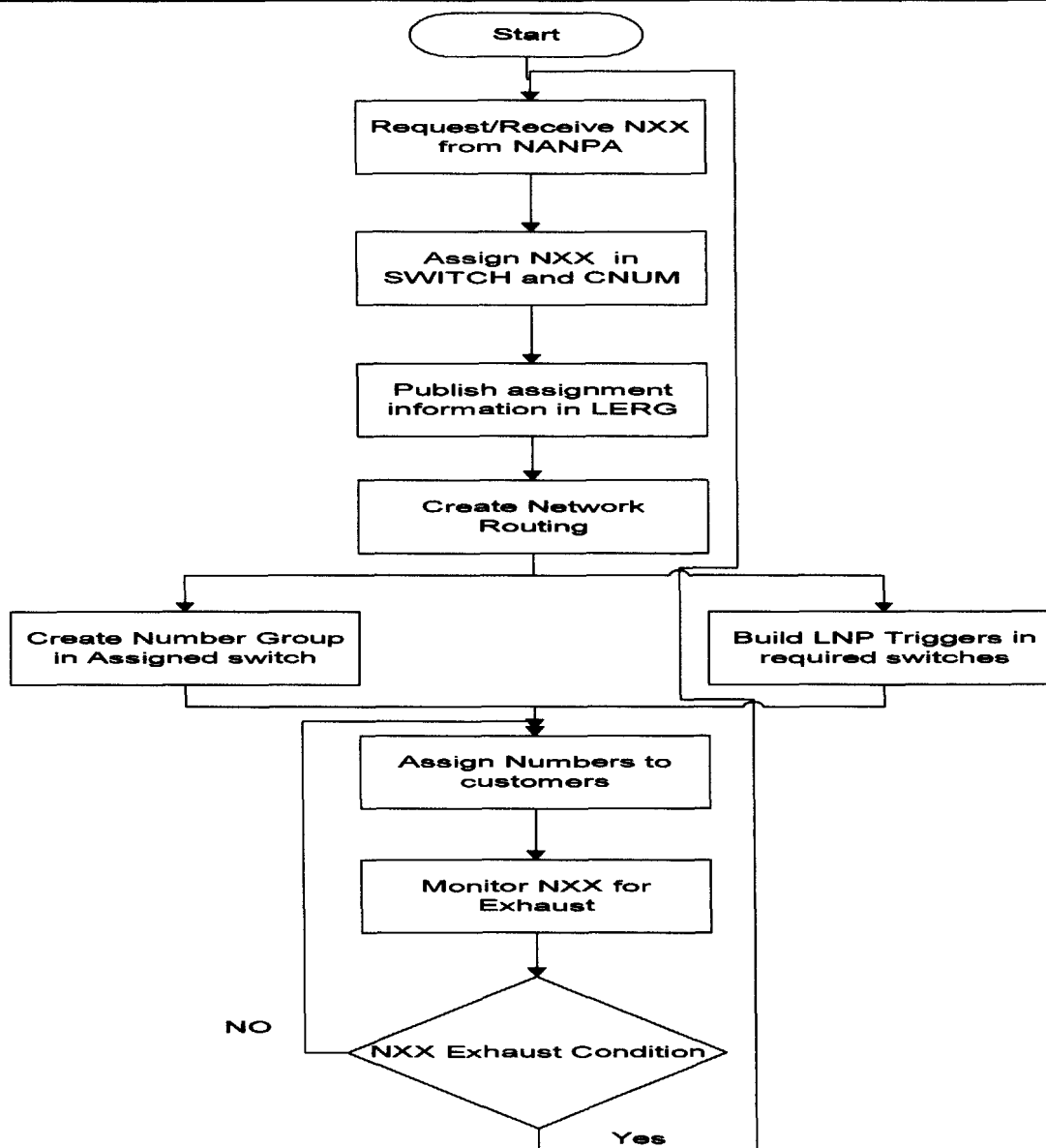


# Qwest Systems Impact

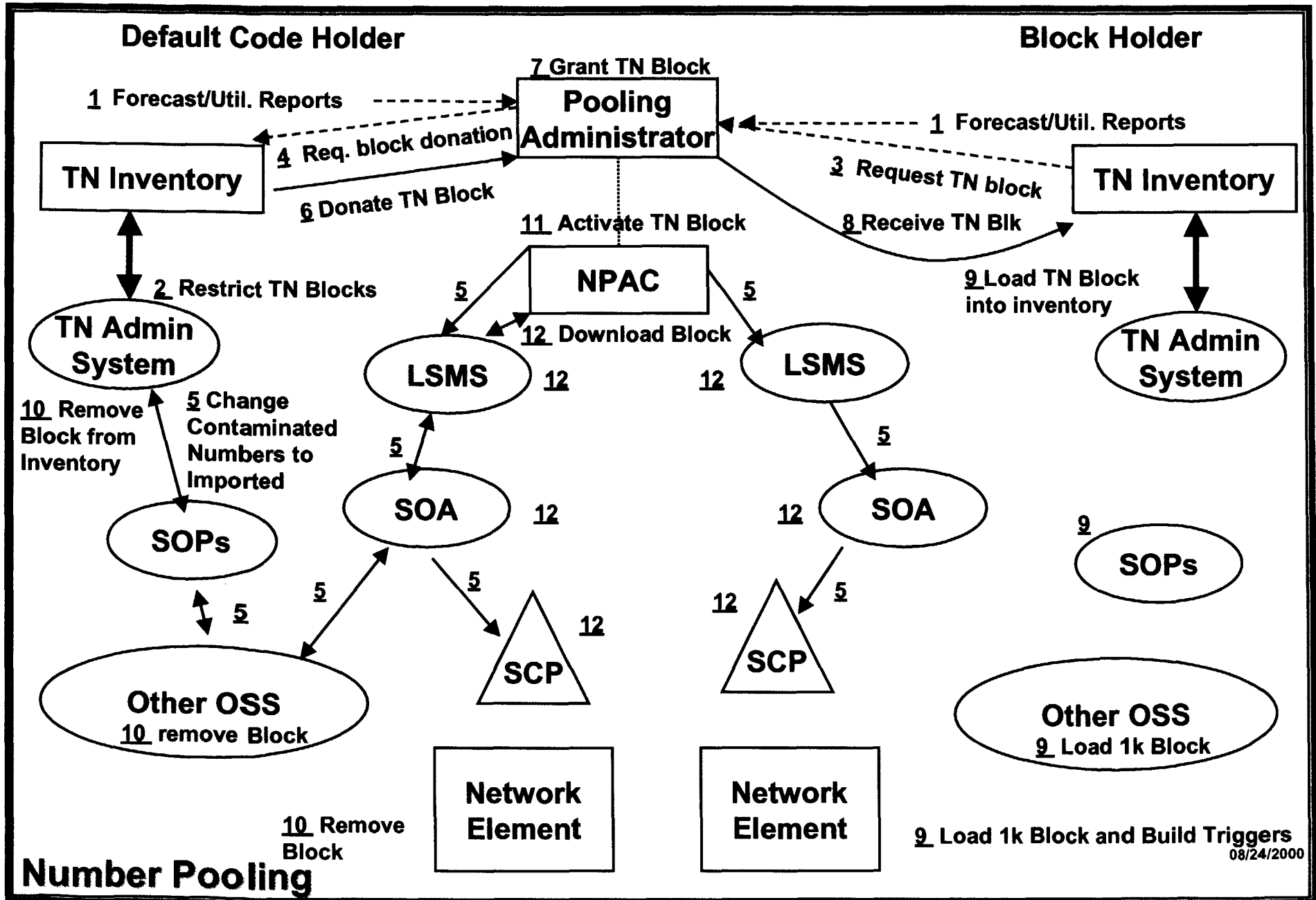
## How will Number Pooling affect Qwest?

- Number Pooling (NP) is based on the LNP framework, but requires the use of new Service Order Field Identifiers (FIDs)
- LNP orders currently make up about 1-2% of total Service Orders. Number Pooling Service Orders will make up greater than 50% of orders.
- Qwest must develop processes that support non-NP and NP environments simultaneously within a given State
- The way in which Qwest requests and inventories Telephone Numbers will change significantly with NP
- Categorizing, reporting and forecasting TNs will change significantly with NP
- NP requires a more efficient use of TNs and a much greater reliance on an accurate source of TN data
- Qwest must develop a method for tracking and restricting the reservation of TNs
- Qwest must develop processes to support State Trials in a manual mode
- Qwest must support System, Integration and Regression

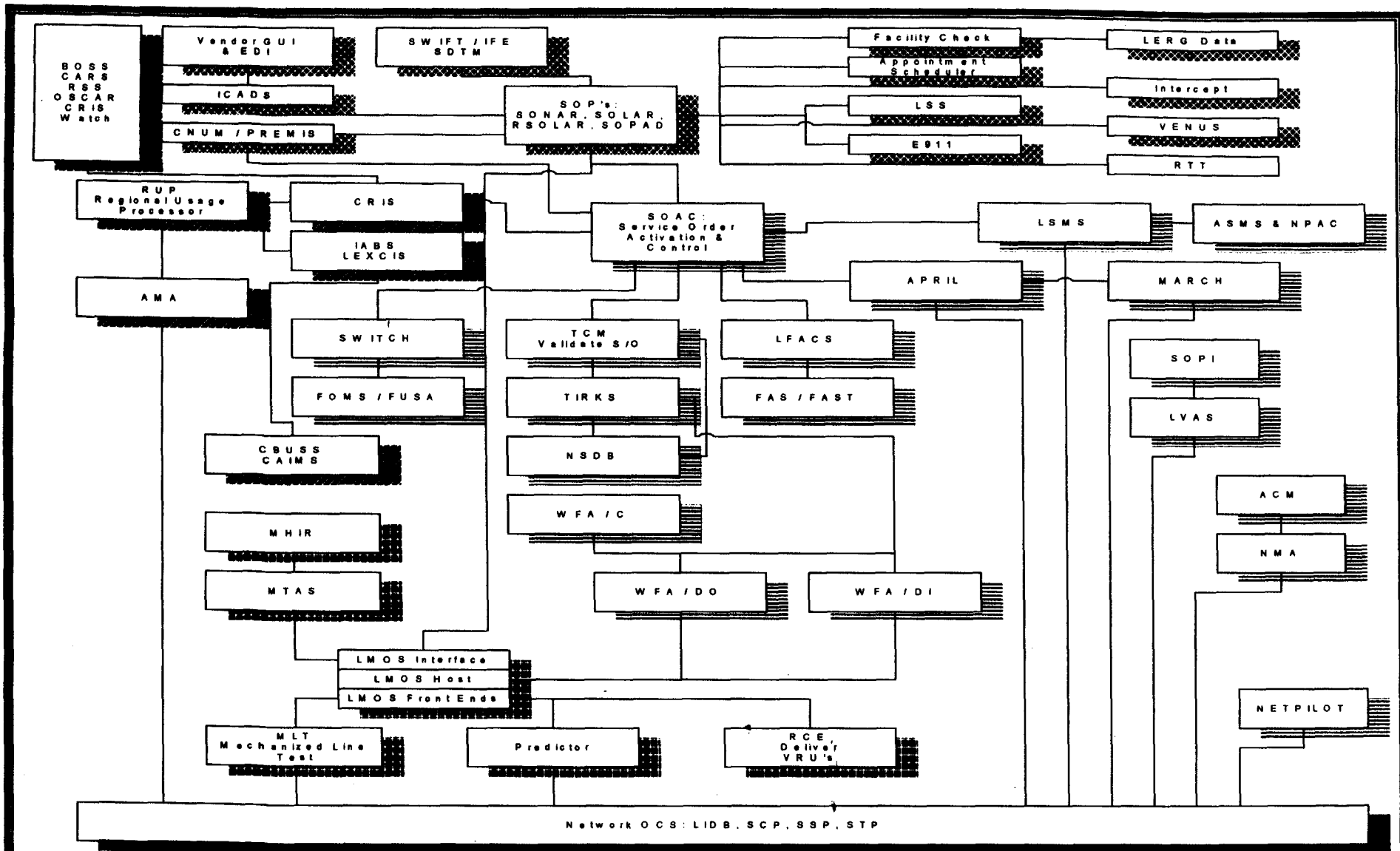
## Assigning a New Code (Old Process)



# Number Inventory Process Flow Changes



# Systems Context Diagram



## **Service Delivery Systems**

TN Administration systems are essential in:

- Donating/Receiving and managing 1K blocks
- Handling contaminated numbers within a 1K block
- Acting as a source of data for Utilization and Forecasting reports.
- Identifying and tracking reserved numbers
- Source of data for populating Service Orders with POOL and EXK FIDS
- Tracking current TN inventory (e.g. when to order new blocks for a Rate Center)

Service Order Processors are required to:

- Identify if the TN on the Service Order is in a pooled 1K block
- Auto-populate POOL and EXK on the Service Order

## **Provisioning and Routing Systems**

Provisioning and Routing Systems system must:

- Recognize and handle the new POOL FID
- Determine what Service Order types will be sent to SOA
- Remove/Add 1K blocks from inventory
- Produce a batch file to update ASMS for routing for Dial Transfer
- Use Efficient Data Representation (1 record = 1000 TNs)
- Handle misrouted calls due to NP



## Billing Systems

Billing Systems provide:

- Capability to bill queries to the Service Control Point Database
- Capability to rate and tax pooled accounts
- Capability to rate and tax pooled accounts for switches that serve multiple Rate Centers
- Billing for NP cost recovery mechanism

## **OSS Work Initiation and Expense Tracking**

- OSS work is initiated via a vendor contract or internal requirements documentation
- A Budget Management System (BMS) number is assigned for each area of a project
- Sub Account codes are assigned to specific Systems or sets of systems
- Employee and Leased worker time, vendor payments, and other project related costs are tracked to the Sub Account codes

## Repair Systems

- Repair Systems must:
  - Recognize new 1K blocks that Qwest is responsible to repair
  - Recognize 1K blocks that Qwest is no longer required to repair